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**FCC MAIL ROOM**

December 30, 1994

**BY OVERNIGHT MAIL**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

**Re: ET Docket No. 94-32**

Dear Mr. Caton:

Enclosed for filing are an original plus nine (9) copies of the Reply Comments of Frontier Corporation in the above-docketed proceeding.

To acknowledge receipt, please affix an appropriate notation to the copy of this letter provided herewith for that purpose and return same to the undersigned in the enclosed, self-addressed envelope.

Very truly yours,

Michael J. Shortley, III

cc: International Transcription Service

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of	)	
	)	
Allocation of Spectrum Below	)	ET Docket No. 94-32
5 GHz Transferred from	)	
Federal Government Use	)	

REPLY COMMENTS OF  
FRONTIER CORPORATION

Frontier Corporation ("Frontier")<sup>1</sup> submits this reply to comments received in response to the Commission's Notice initiating this rulemaking.<sup>2</sup> In its comments, Frontier supported allocation of the 2390-2400 MHz band, paired with the 2300-2310 MHz band, for wireless local loop service. Other parties have suggested that these frequencies be allocated to other services, principally Amateur Radio<sup>3</sup> and Part 15<sup>4</sup> services.

Frontier continues to believe that allocation of these bands for wireless local loop services would serve the public interest better than the alternatives proposed.<sup>5</sup> Amateur Radio service currently has sufficient spectrum allocated to it. Similarly, the Commission has already licensed spectrum for unlicensed devices. The public interest benefits of

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<sup>1</sup> Frontier Corporation was formerly known as Rochester Telephone Corporation.

<sup>2</sup> *Allocation of Spectrum Below 5 GHz Transferred from Federal Government Use*, ET Dkt. 94-32, Notice of Proposed Rulemaking, FCC 94-272 (Nov. 8, 1994).

<sup>3</sup> *E.g.*, Palomar Radio Amateur Club, *passim*.

<sup>4</sup> *E.g.*, Cincinnati Microwave, *passim*.

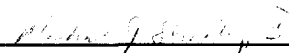
<sup>5</sup> Frontier also notes that Cornell University has requested special interference protection for the radio-astronomy facility that it operates at Arecibo, Puerto Rico in the 2370-2390 MHz band. Cornell, *passim*. Frontier agrees that the research conducted at this facility is extremely valuable. Thus, however the Commission allocates the 2390-2400 MHz band, it should adopt rules that prevent interference to the work carried out at Arecibo.

allocating additional spectrum for these uses (on a primary, or continuing an allocation on a secondary basis) seem speculative, at best.

On the other hand, as the United States Telephone Association and Frontier demonstrated in their comments,<sup>6</sup> allocation of these two 10 MHz bands for wireless local loop service would advance the public interest by permitting telephone companies to bring telephone service to areas of the country that are currently unserved or underserved. It would also permit them to serve high-cost areas more effectively than they could through the use of conventional wireless or Basic Exchange Radio Telephone Service technologies.

On this basis, the Commission should pair the 2300-2310 MHz band with the 2390-2400 MHz band and allocate these bands for use in providing wireless loop services.

Respectfully submitted,

  
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Michael J. Shortley, III

Attorney for  
Frontier Corporation

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(716) 777-1028

December 30, 1994

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<sup>6</sup> USTA at 2-4; Frontier (Rochester) at 1-2.

### **Certificate of Service**

I hereby certify that, on this 30th day of December, 1994, copies of the foregoing Reply Comments of Frontier Corporation were served by first-class mail, postage prepaid, upon the parties on the attached service list.

  
\_\_\_\_\_  
Michael J. Shortley, III

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